

January 19, 2011

Project #: 1009644004 - 54

Mr. Mark Lewis
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

Subject: Certification of Closure – Container Storage Area
Montville Generating Station
Montville, Connecticut

Dear Mr. Lewis:

On behalf of Montville Power LLC (owned by NRG Energy, Inc.), Shaw Group Inc.® (Shaw) has prepared this Certification of Closure to document the closure activities of the Container Storage Area (CSA) at Montville Generating Station. Closure Plans for the CSA were detailed in multiple documents at the recommendation of Dave Ringquist of the Connecticut Department of Environmental Protection (CTDEP) in order to meet the intent of the RCRA Closure Plan Part 1, Part 2 and Part 3 (CPP 1, CPP 2 and CPP 3). The Addendum to RAP - Closure Plan Part 1 (CPP 1) prepared by Shaw on November 23, 2009 was approved on December 17, 2009 by the CTDEP in a concurrence letter addressed to Andrew Walker, site Licensed Environmental Professional (LEP). The Addendum to RAP - CPP 2 and 3 prepared by Shaw on May 27, 2010 was approved on August 11, 2010 by the CTDEP in a concurrence e-mail addressed to Andrew Walker, site LEP. Public Notice Activities for the CSA Closure were completed on December 26, 2010. A copy of the public notice is included as **Attachment 1**. No public comments were received.

The CPP 1, CPP 2 and CPP 3, public notice and this Certification of Closure follow the "Draft RCRA Closure Plan Guidance for TSD Facilities, CSAs, and Tank Systems" prepared by CTDEP dated November 1993.

The CSA is shown as AOC 14 on the attached **Figure 1**.

CERTIFICATION OF CLOSURE

A. PROVISION FOR CERTIFICATION BY OWNER OR OPERATOR

Montville Power LLC, owner and operator of the CSA, provides that closure of the CSA was performed in accordance with the plan provided in the CPP 2 and CPP 3. As stated in the CPP2 and 3, the subject CSA would be closed clean because the concrete slab floor and surrounding and underlying soils were not impacted by a release from the regulated unit. There was no removal and disposal/decontamination of waste, equipment, structures, or soil as part of the clean closure.

Note that wash water collected during the steam cleaning of the CSA under CPP 1 was characterized and transported offsite for appropriate disposal at the Veolia Facility in Flanders, NJ. on June 2, 2010.

A copy of the waste manifest is included as **Attachment 2**.

As a result of the closure assessment performed, it was established that achievement of Media Closure Criteria (MCC) were met. Thus, there is no need for further maintenance of the CSA, and post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff or hazardous waste decomposition products to the ground or surface waters or to the atmosphere has been eliminated.

B. PROVISION OF CERTIFICATION BY AN INDEPENDENT LICENSED PROFESSIONAL ENGINEER AND FACILITY OWNER

An independent licensed Professional Engineer, Lawrence Nesbitt of Shaw, as well as the representative of the facility owner, Jeff Araujo of Montville Power LLC (Plant Manager), certifies that the facility was closed in accordance with the approved closure plan. The certifying signatures and stamp (as applicable) are provided below.

Lawrence Nesbitt
Professional Engineer
Shaw Group, Inc.



Jeff Araujo
2/3/11

Jeff Araujo
Plant Manager
Montville Power LLC

C. PROVISION FOR CLOSURE DOCUMENTATION REPORT

This Certification of Closure documents the clean closure completed at the subject CSA. As stated above, these activities were conducted in accordance with the closure plan, CPP 2 and CPP 3. In addition, the closure has been certified by an independent licensed Professional Engineer.

D. SUMMARY OF ALL QA/QC DATA COLLECTED DURING CLOSURE

During the closure assessment activities, QA/QC data were collected. The QA/QC data included two background concrete chip samples, one duplicate concrete chip sample, and one duplicate sample of the sub-slab soil. As described in the CPP 2 and CPP 3, a Shaw data validator completed an evaluation on the soil and concrete chip data. The data, including the background and duplicate samples, were determined to be acceptable for use for closure.

E. PHOTOGRAPHIC RECORD OF EACH MILESTONE EVENT

A photographic log of the CSA during inspection activities, prior to the CSA closure, was included in the CPP 1. As discussed above, there was no removal and disposal/decontamination of additional waste, equipment, structures, or soil as part of the clean closure; therefore, additional photographic documentation is not warranted.

F. DEPARTURE FROM THE APPROVED CLOSURE PLAN

Closure activities were performed in accordance of the closure plan, CPP 2 and CPP 3. There were no departures from the approved closure plan.

G. CERTIFICATION STATEMENT

The details in this document provide certification that closure of the CSA was completed in accordance with the CPP 2 and CPP 3, and complete clean closure of the CSA has been achieved.

H. VERIFICATION SAMPLE RESULTS

The subject CSA was closed clean because the concrete slab floor and surrounding and underlying soils were not impacted by a release from the regulated unit. Remediation was not warranted. There was no removal and disposal/decontamination of waste, equipment, structures, or soil as part of the clean closure. Therefore, verification samples are not warranted.

I. REVISED PART A PERMIT APPLICATION

Clean closure has been achieved for the regulated unit, the CSA. There are no other operating, regulated units at the Montville Power, LLC facility. Thus, a revised Part A Permit is not required.

J. REQUEST FOR WITHDRAWAL OF THE PART A PERMIT

Montville Power has performed complete closure of all regulated units at the Montville Power LLC facility.

The regulated units include the CSA and the former Equalization Basin (EB-2) located in the central portion of the site, east of the upper switchyard, as shown on **Figure 1**. EB-2 was constructed in 1978 in an area historically used for coal storage and coal ash disposal. The basin was lined and formerly accepted wastewater from the boilers. Use of the EB-2 basin ended in 1988. EB-2 was closed "clean" in accordance with the requirements for clean closure by the USEPA- and CTDEP-approved "Closure Plan" dated September 9, 1987. The Certification of Closure Report for EB-2 was submitted to USEPA in January 1991. In addition, groundwater monitoring reports prepared by Northeast Utility Service Company for the 1992 through 1996 quarterly groundwater sampling rounds indicated there were generally no significant increases of the four RCRA indicator parameters (pH, specific conductance, total organic carbon and total organic halides) in comparison to the initial background samples collected in 1985. These results suggested that there is no impact to groundwater from the closed EB-2. Final closure of EB-2 was issued by CTDEP in a letter dated June 21, 2001.

As part of this Closure Certification document (January 19, 2011), Montville Power LLC requests the withdrawal of the Part A Permit for the regulated unit, CSA.

If you have any questions regarding this letter or any other site matter, please do not hesitate to call us.

Sincerely,

The Shaw Group Inc.®



Andrew D. Walker, LEP, LSP
Project Manager

cc: Tim Sisk, Montville Power LLC
Bob Spooner, NRG
Juan Perez, USEPA (electronic)

Enclosures:

Figure 1 - Site Plan
Figure 2 – CSA Plan (AOC 14)

Attachment 1 - Public Notice
Attachment 2 - Waste Manifest

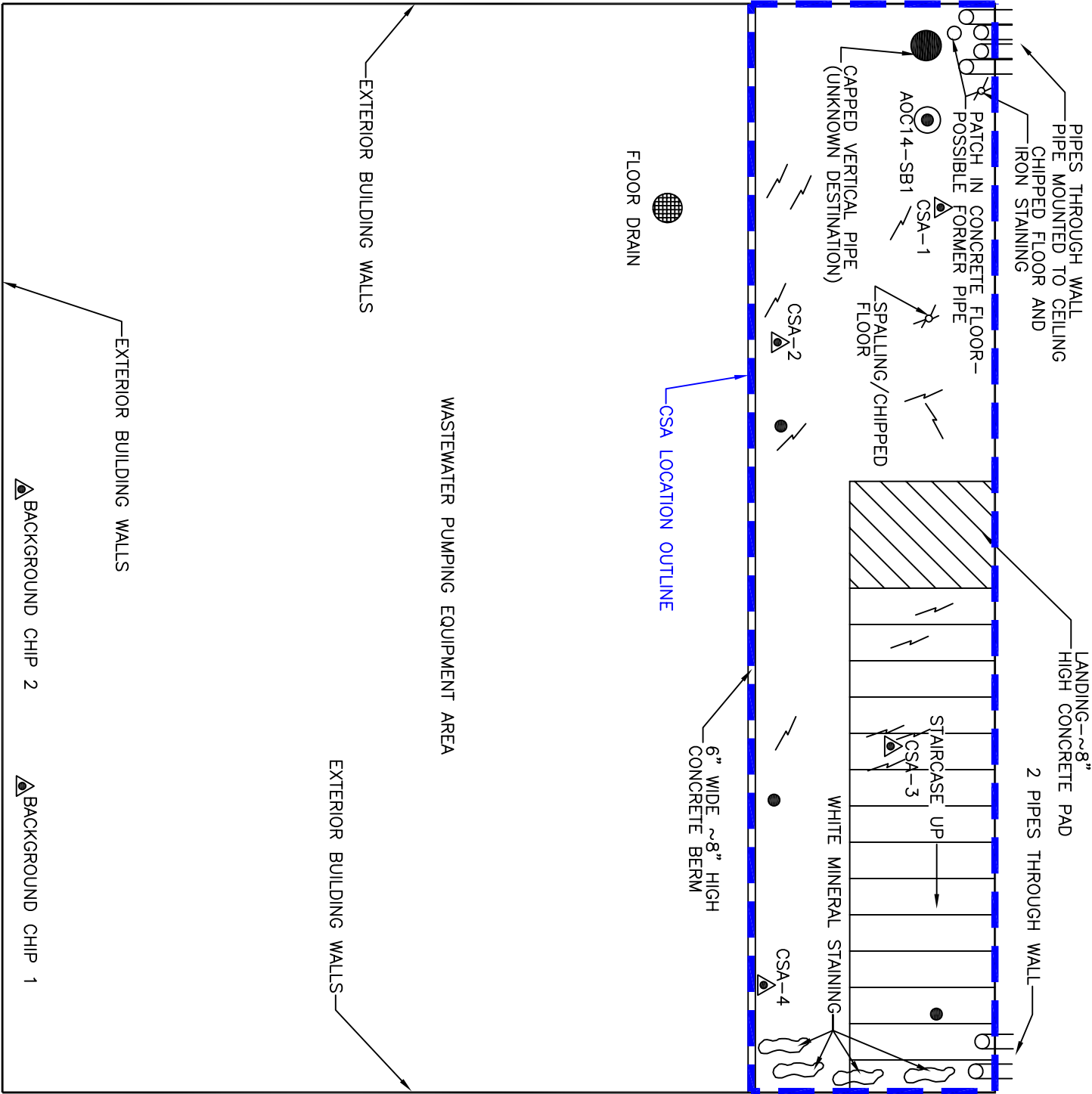
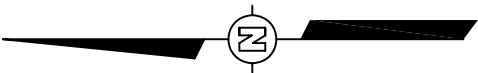
FIGURES

Figure 1 Site Plan
Figure 2 CSA Plan (AOC 14)

OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER	100964400-SITEPLAN
STOUGHTON	CD	12/15/08	RC	12/15/08	--	--		

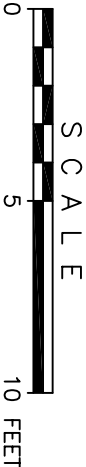


OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
STOUGHTON, MA	CD	05/24/10	JD	05/24/10
			--	--



- LEGEND**
- ▲ CONCRETE CHIP SAMPLE LOCATION (COMPLETED BY SHAW)
 - CONCRETE CORE AND SUB SLAB SAMPLE LOCATION (PROPOSED)
 - ⦿ CONCRETE CORE AND SUB SLAB SAMPLE LOCATION (COMPLETED BY SHAW)
 - ⚡ SURFICIAL HARLINE CRACKS <1/16"

NOTES:
FEATURES SHOWN AT STAIRCASE AREA ARE LOCATED ON CSA FLOOR.



REFERENCE:
PLAN DERIVED FROM SHAW ENVIRONMENTAL
FIELD RECONNAISSANCE.



100 TECHNOLOGY CENTER DRIVE
STOUGHTON, MASSACHUSETTS
(617) 589-5111

FIGURE 2
CSA PLAN (AOC 14)
BASEMENT LEVEL OF
WASTEWATER TREATMENT BUILDING
MONTVILLE GENERATING STATION
MONTVILLE AND WATERFORD, CONNECTICUT

ATTACHMENT 1

PUBLIC NOTICE



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INC., a Connecticut corporation, formerly known as Nova Electronics, Inc., having its former principal office and

smoker. Very clean. Well maintained. 156000 Gar kept. No rust. Reliable. R great! \$4400 Call D 501-211-2000

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moving, \$175.00 call
281-5126

Queen
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12/

ATTACHMENT 2

WASTE MANIFEST



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CTD049181854	2. Page 1 of 1	3. Emergency Response Phone (877) 818-0087	4. Manifest Tracking Number 000037239 VES				
5. Generator's Name and Mailing Address NRG MONTVILLE OPERATIONS, INC. ATTN: TIMOTHY SISK 74 LATHROP RD MONTVILLE, CT 06382			Generator's Site Address (if different than mailing address) NRG MONTVILLE OPERATIONS, INC. 74 LATHROP RD UNCASVILLE, CT 06382						
Generator's Phone: 860 848-8017			U.S. EPA ID Number NJ0080831389						
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS			U.S. EPA ID Number NJ0054128184						
7. Transporter 2 Company Name FREEHOLD CARTAGE INC			U.S. EPA ID Number NJ00808538583						
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC 1 EDEN LANE FLANDERS, NJ 07838			U.S. EPA ID Number NJ00808538583						
Facility's Phone: 973 347-1900									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
			No.	Type					
	X	1. UN2796, WASTE SULFURIC ACID WITH NOT MORE THAN 51% ACID, 8, II	001	DF	00010	P	D002		
	X	2. UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, 8, III	002	DM	00384	K	CR01		
		3.							
		4.							
14. Special Handling Instructions and Additional Information 1) ERG:157 W:155137 A:TWBB1445 2) ERG:171 W:132822 A:VNJPTAVES070 PCB SERIAL#12588858891 OSD 06/02/2010 -(- ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 267.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offor's Printed/Typed Name TIMOTHY SISK		Signature <i>[Signature]</i>		Month 08		Day 02		Year 10	
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:						
	Transporter signature (for exports only):								
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials		Signature <i>[Signature]</i>		Month 08		Day 02		Year 10
	Transporter 1 Printed/Typed Name PETER KAVANAUGH		Signature		Month 08		Day 02		Year 10
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name		Signature		Month 08		Day 02		Year 10
	18. Discrepancy								
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
	Manifest Reference Number:								
18b. Alternate Facility (or Generator)		U.S. EPA ID Number							
Facility's Phone:									
18c. Signature of Alternate Facility (or Generator)		Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1.		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name		Signature		Month Day Year					